



GRIFFON CONFLICT MINERALS POLICY

In 2012, the U.S. Securities and Exchange Commission (the "SEC") adopted rules mandated by the Dodd-Frank Wall Street Reform and Consumer Protection Act. The rules require all public companies to annually disclose whether any of their products contain "3TG" minerals (Tin, Tantalum, Tungsten and Gold) that may have originated from mines in the Democratic Republic of Congo or certain adjoining countries.

Griffon Corporation ("Griffon") has designed a Conflict Minerals compliance initiative, with a governance committee, to implement a consistent, company-wide due diligence process. Griffon and its subsidiaries are working with our supply chain partners to comply with applicable SEC regulations by:

- Educating our employees and suppliers about conflict minerals;
- Requesting key suppliers to identify which of their products that we purchase contain tin, tungsten, tantalum or gold, and, where applicable, to validate the country of origin of these minerals; and
- Preparing for an independent audit of Griffon's conflict minerals approach and processes, when required.

As the international supply chain for these 3TG minerals is complex, we recognize that due diligence efforts required are challenging and are expected to take considerable time to complete. We are committed to conducting business in a lawful manner and supporting our customers' reporting requirements.

For additional information, please call (888) 298-4032.